

EXHIBIT S

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK NWAUZOR,)
FERNANDO AGUIRRE-URBINA,)
individually and on behalf of)
all those similarly situated,)
)
Plaintiffs/Counter-Defendants.)
)
vs.) NO. 3:17-CV-05769-RJB
)
THE GEO GROUP, Inc.,)
)
Defendant/Counter-Claimant.)

DEPOSITION UPON ORAL EXAMINATION OF DEBRA JEAN EISEN

Friday, December 13, 2019
Tumwater, Washington

NWAUZOR vs GEO GROUP
Debra Eisen, 12/13/2019

1 APPEARANCES :

2 FOR THE DEFENDANT :

3 MS. JOAN MELL
4 III Branches Law
1019 Regents Blvd., Suite 204
Fircrest, WA 98466

5 FOR THE STATE OF WASHINGTON:

6 MS. MARSHA CHIEN
7 ASSISTANT ATTORNEY GENERAL
800 Fifth Avenue, Ste. 2000
Olympia, WA 98104-3188

8 FOR DEPARTMENT OF CORRECTIONS:

9 MS. KATIE FABER
10 ASSISTANT ATTORNEY GENERAL
11 P.O. Box 40116
Olympia, WA 98504-0116

NWAUZOR vs GEO GROUP
Debra Eisen, 12/13/2019

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

EXAMINATION	PAGE/LINE
MS. MELL	4 12

E X H I B I T I N D E X

EXHIBIT NO.	DESCRIPTION	PAGE/LINE
-------------	-------------	-----------

(NO EXHIBITS MARKED)

NWAUZOR vs GEO GROUP
Debra Eisen, 12/13/2019

1 BE IT REMEMBERED that on Friday, December 13,
2 2019, at 1:02 p.m. at 7345 Linderson Way SW, Tumwater,
3 Washington, before DIXIE J. CATTELL, Certified Court
4 Reporter, appeared DEBRA JEAN EISEN, the witness herein;
5 WHEREUPON, the following proceedings were had,
6 to wit:

7
8 DEBRA JEAN EISEN, having been first duly sworn,
9 testified as follows:

10
11 EXAMINATION

12 BY MS. MELL:

13 Q State your name.

14 **A Debra Jean Eisen.**

15 Q What's your position?

16 **A I am the contracts administrator for the Department of**
17 **Corrections, Washington State.**

18 Q Have you been designated as the State's CR 30(b)(6)
19 designee to speak on particular subjects today?

20 **A Not officially.**

21 Q What does that mean?

22 **A I mean, I have not received designation from my chain of**
23 **command. I've been requested by the AG to speak on behalf**
24 **of the agency.**

25 Q On what subjects?

NWAUZOR vs GEO GROUP
Debra Eisen, 12/13/2019

1 **A Yes.**

2 Q And was it deemed necessary from the State's perspective to
3 authorize detainee work in order to maintain the safety and
4 security of those detainees?

5 MS. CHIEN: Object to form.

6 **A I can't speak to that.**

7 Q (By Ms. Mell) Why would you include it in the contract?

8 **A The ability to have offenders work is in every contract we**
9 **have with another entity to house offenders.**

10 Q Why is it in there?

11 **A My opinion, my belief, not speaking -- well, I am speaking**
12 **for the agency. So I will say that there is an idleness**
13 **concern that offenders are occupied during their**
14 **incarceration --**

15 Q So is it --

16 **A -- in addition to programming whatever else is available.**

17 Q Is that a policy choice of the State of Washington?

18 MS. CHIEN: Object to form.

19 **A I cannot speak to that.**

20 Q (By Ms. Mell) Is it a policy choice of the Department of
21 Corrections?

22 **A It is a safety and security choice for the Department of**
23 **Corrections.**

24 Q And the Department of Corrections does not require
25 contractors like GEO to pay minimum wage to the detainees

NWAUZOR vs GEO GROUP
Debra Eisen, 12/13/2019

C E R T I F I C A T E

I, DIXIE J. CATTELL, the undersigned Registered Professional Reporter and Washington Certified Court Reporter, do hereby certify:

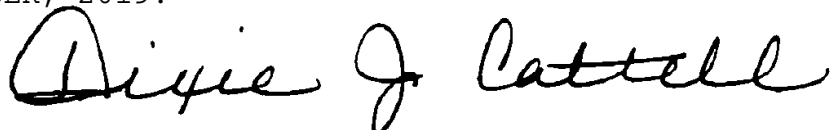
That the foregoing deposition of DEBRA JEAN EISEN was taken before me and completed on the 13th day of December, 2019, and thereafter transcribed by me by means of computer-aided transcription; that the deposition is a full, true and complete transcript of the testimony of said witness;

That the witness, before examination, was, by me, duly sworn to testify the truth, the whole truth, and nothing but the truth, and that the witness reserved signature;

That I am not a relative, employee, attorney or counsel of any party to this action or relative or employee of such attorney or counsel, and I am not financially interested in the said action or the outcome thereof;

That I am herewith securely sealing the deposition of DEBRA JEAN EISEN and promptly serving the same upon MS. JOAN MELL.

IN WITNESS HEREOF, I have hereunto set my hand this 17th day of DECEMBER, 2019.



Dixie J. Cattell, RPR, CCR
NCRA Registered Professional Reporter
Washington Certified Court Reporter CSR#2346